

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE NO. 22-CR-20114-KMW**

UNITED STATES OF AMERICA,

vs.

CARLOS RAMON POLIT FAGGIONI,

Defendant.

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UNOPPOSED MOTION TO SEAL CERTAIN ADMITTED TRIAL EXHIBITS

The United States of America, by and through the undersigned Assistant United States Attorney, respectfully requests that trial exhibit numbers 4-7, 6-3, 7-4, 9-6, 10-1, 10-1A, 10-2, 10-2A, 12-1, 12-2, 12-3, 12-4, 12-5, 12-10, 12-11, 12-12, 12-13, 12-14, 12-15, and 14-2 be SEALED until further order of this Court. These exhibits consist of composite bank records that contain extensive personal identifying information, as well as account information, belonging to third parties.

The government introduced the composite bank record exhibits for purposes of completeness at trial. The government introduced for the jury relevant excerpts from these composite exhibits as subexhibits and these subexhibits will be filed openly on the docket as admitted exhibits. The undersigned has conferred with defense counsel and they have no objection to the relief requested in this motion.

Respectfully submitted,

MARKENZY LAPOINTE
UNITED STATES ATTORNEY

By: /s Michael N. Berger
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 3, 2024, I electronically filed the foregoing with the Clerk of the Court using CM/ECF and sent a copy of the proposed order to williams@flsd.uscourts.gov.

/s/ Michael N. Berger

Michael N. Berger

Assistant United States Attorney